

IN THE UNITED STATES
DISTRICT COURT OF GUAM
TERRITORY OF GUAM

PEOPLE HOLDINGS CO., LTD.,

Plaintiff,

vs.

SUN Y. WAKUGAWA and KOWON
SHIPPING CORP.

Defendants.

Civil Case No.03-00034

**AFFIDAVIT IN SUPPORT OF
MOTION FOR TEMPORARY
RESTRAINING ORDER**

I, Benny B. Bello, declare as follows:

1. I am not a party to this action and was at all times herein mentioned not a party to said action; that I am a citizen of the United States of America, over the age of eighteen (18) years, and in no way disqualified from testifying as a witness.

2. I am a managing director of BKA-KOKU LLC, Guam corporation; that I have shipped over sixty thousand (60,000) metric tons of metallic waste and 14 vessels for the last five years; and that I have experiences of dealing with the Defense Reutilization & Marketing Office (hereinafter "DRMO") and am familiar with its procedures as a former bid winner.

3. I believe that SUN Y. WAKUGAWA and KOWON SHIPPING CORP. has made false statements with respect to the costs for the removal of cargo from DRMO Guam.

4. I believe that SUN Y. WAKUGAWA and KOWON SHIPPING CORP. defrauded PEOPLE HOLDINGS CO., LTD. by falsely charging \$40,000.00 for trucking from DRMO to staging/storage site. There was no requirement for movement of metals to staging site because DRMO allowed direct loading to the scrap vessel at the navy port.

5. I believe that SUN Y. WAKUGAWA and KOWON SHIPPING CORP. fraudulently charge \$76,950.00 with regard to loading fees at Port Authority of Guam, because the material was authorized to loaded at the naval base which waived fees for loading. Port of Authority of Guam was not involved in proving loading services and wharf services for DRMO cargo..

ORIGINAL

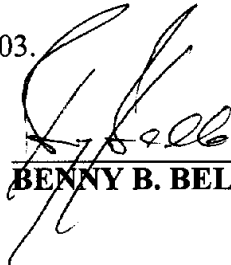
6. I believe that SUN Y. WAKUGAWA and KOWON SHIPPING CORP. are defrauding PEOPLE HOLDINGS CO., LTD. for charging \$12,000.00 for scrap storage. There should be no scrap storage fees as this material was located at DRMO and still presently at DRMO and there is no storage fee of the cargo at the site.

7. I believe that SUN Y. WAKUGAWA and KOWON SHIPPING CORP. are defrauding PEOPLE HOLDINGS CO., LTD. by falsely charging \$30,000.00 for Trucking to Port Authority of Guam. Scrap metals are still located at the DRMO site and to be directly loaded to the scrap vessel.

8. Upon information and belief, SUN Y. WAKUGAWA and KOWON SHIPPING CORP. through Guam Metal Development, Inc., secured a vessel to ship the DRMO metal scrap currently located in the US Naval Base on Guam, and the vessel has arrived on Guam on December 16, 2003 and has scheduled to load DRMO cargo immediately.


I declare under penalty of perjury under the Laws of the United States that the foregoing is true and correct.

EXECUTED this 16th day of December, 2003.


BENNY B. BELLO

SUBSCRIBED AND SWORN to before me this 16th day of December, 2003.




NOTARY PUBLIC
BRENDA L. CRUZ
NOTARY PUBLIC
In and for Guam U.S.A.
My Commission Expires: April 11, 2004
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East West Business Center
Tumon, Guam 96911